

DIVISION OF ALCOHOL AND TOBACCO CONTROL

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Primary American Source of Supply – Brand Label Registration Requirements

Issued March 2, 2020

Effective March 2, 2020, the Division of Alcohol and Tobacco Control (ATC) implemented changes to primary American source of supply brand label registration requirements. The user manuals available on our website at <https://atc.dps.mo.gov> and the ATC Online System reflect the following changes.

- ATC no longer requires the registration of each proof and/or age of an intoxicating liquor. The importer, solicitor, manufacturer, brewer and/or wholesale licensee is required by state statute to offer for sell only products with an alcohol content that their license type allows.
- ATC no longer requires each specialized necker name to be registered once the TTB (Alcohol and Tobacco Tax and Trade Bureau) Certificate of Label Approval (COLA) has been approved by ATC for the product. (For instance, AAA whiskey has different specialized names of the same product to include, AAA Orchard, AAA Tucker, AAA Tinseltown and AAA Bulldozer. The product, brand label and mandatory label are the same, but the bottle has a necker label that identifies the different specialized names. All four products would fall under the initial brand registration.)
- Label revisions are not required to be submitted for graphic, color, or font changes. However, if class and type changes you are required to submit this to ATC as a label revision on the ATC Online System.
- Gift Packs/Combo Packages/VAPs are not required to be registered separately, but the product(s) that are part of the package must be registered with ATC.
- Promotional Labels that reflect sports leagues, team organizations, events, holidays or festival themes are not required to be registered once the TTB COLA has been approved by ATC for the product. (For instance, MLB champion label)
- Actual labels are not required to be uploaded on the ATC Online System when registering a product that a TTB COLA is uploaded for.
- Actual labels ARE required to be uploaded on the ATC Online System when registering a cider with no TTB COLA; a low alcohol with no TTB COLA; or an IRC with no TTB COLA.
- The primary American source of supply is responsible for clearing the ATC Online System of duplicate brands by moving these to an inactive status. Keep in mind you must have a permission to ship letter and a wholesaler appointment letter corresponding to the active brand number.

If you have any questions, feel free to contact the Compliance Section at (573) 751-7891 or (573) 751-5452.

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Updated: March 24, 2022